June 18, 2024

## VIA CM/ECF

Hon. Matthew J. Skahill United States Magistrate Judge Mitchell H. Cohen U.S. Courthouse One John F. Gerry Plaza Fourth and Cooper Streets Camden, NJ 08101

Re: Zurich American Insurance Company v. Asphalt Paving Systems, Inc.

**Docket No.: 1:22-cv-01535-CPO-MJS** 

**Joint Letter** 

Dear Judge Skahill:

As ordered by this Court on June 14, 2024, the parties jointly submit the following agreed upon dates for the depositions of Joseph Meola, Robert Capoferri, and Asphalt Paving Systems Inc.'s Rule (30)(b)(6) representative. Further, Asphalt Paving Systems, Inc. has elected to pursue a deposition of Karen Eckert. The dates for each deposition is set forth below.

Deponent	Deposition Date
Joseph Meola	June 28, 2024
Robert Capoferri	July 24, 2024
Asphalt Paving Systems, Inc.'s Rule 30(b)(6) representative	July 25, 2024
Karen Eckert	July 23, 2024

## **JOINTLY SUBMITTED BY:**

**PLAINTIFF** 

**DEFENDANT** 

/s/ Christopher B. Fontenelli

/s/ John F. Palladino

June 18, 2024 Page 2

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cc: All Counsel of Record by ECF Notice